

**IN THE UNITED STATES DISTRICT COURT
FOR DISTRICT OF DELAWARE**

In re: Mobile Telecommunications Technologies, LLC,	C.A. No. 16-md-2722-LPS-CJB
MOBILE TELECOMMUNICATIONS TECHNOLOGIES, LLC, Plaintiff, v. AEROHIVE NETWORKS, INC., Defendant.	C.A. No. 16-700-LPS-CJB
MOBILE TELECOMMUNICATIONS TECHNOLOGIES, LLC, Plaintiff, v. XIRRUS, INC. AND RIVERBED TECHNOLOGY INC., Defendants.	C.A. No. 16-701-LPS-CJB

STIPULATION FOR STAY OF CASE DEADLINES

WHEREAS, the above cases have been stayed multiple times;

WHEREAS, the Parties have reached an agreement in principle to settle this matter, and request time to finalize a settlement;

WHEREAS, in consideration of the foregoing, the Parties hereby stipulate and agree, subject to the Court's approval, that:

1. All case deadlines in the Actions (including but not limited to any deadlines to respond to already-served discovery, to file responses or replies to pending motions,¹ and to complete fact discovery) be stayed until **March 25, 2018**.
2. The Parties to any Actions that are continuing as of **March 25, 2018** (i.e., any Actions wherein a notice of dismissal or stipulation to dismiss has not been filed) will negotiate and propose to the Court an amended case schedule to be filed as soon as reasonably possible.
3. For any Action not resolved and dismissed during the stay, MTel will serve no later than **March 25, 2018** its Final Infringement Contentions, subject to the right of any such party in the remaining Actions to challenge the sufficiency of such Final Infringement Contentions or to otherwise challenge the Final Infringement Contentions.

Dated: February 26, 2018

Respectfully submitted,

FARNAN LLP

**WILSON SONSINI GOODRICH &
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¹ The following motions are pending and not fully briefed as of today's date, and the Parties would propose, by this Stipulation, to suspending briefing on those motions until and if the stay is lifted in the Action(s) in which that motion is pending (at which time the relevant Parties will meet and confer and propose to the Court a new schedule for finalizing briefing on those motions): Defendants Xirrus and Riverbed Technology, Inc.'s Motion to Dismiss for Improper Venue or in the Alternative to Transfer (D.I. 449, D.I. 450 in C.A. No. 16-2722-LPS-CJB); MTel's Motion for Joinder and Consolidation under Federal Rules of Civil Procedure 25(c) and 42(a) (D.I. 457 in C.A. No. 16-2722-LPS-CJB).

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Inc., and Riverbed Technology, Inc.*

IT IS SO ORDERED, this _____ day of _____, 2018.

The Honorable Leonard P. Stark
Chief, United States District Judge